IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA 1:17-CV-611-CCE-LPA

VENICE PI, LLC	Plaintiff,)
V.)
DOES 1-11,)
	Defendants.)
)

PLAINTIFF'S RESPONSE TO DEFENDANT DOE'S MOTION TO QUASH SUBPOENA AND TO PROCEED ANONYMOUSLY

Anonymous Doe Defendant, with an unknown IP Address, has objected to the subpoena that was issued to discover the Doe's name and address. To the extent the objection is based on privacy concerns or an argument on the merits, it should be denied at this juncture. *Dallas Buyers Club v. Doe*, 2014 U.S. Dist. LEXIS 113846, 3-5, 2013 WL 4084751 (W.D. Wis. July 8, 2014). In addition, there are no privacy expectations where the copyrights of Plaintiff are at stake. See Memorandum in Support of Plaintiff's Motion for Leave to Take Discovery, [DE 5, page 5].

In addition, Plaintiff questions the standing of "Doe Defendant." The author of Doe Defendant's pleading [DE 9] has given no identifying information to the Court. Thus, Plaintiff questions whether Doe Defendant has proper standing to raise the issues set forth in its filing.

Finally, Plaintiff has no issue with Doe's request to protect its identity. In that regard, Plaintiff is willing to enter into a reasonable protective order to maintain the confidentiality of the Doe's identity and contact information.

For the reasons set forth herein, Plaintiff requests the Doe Defendant's Motion to Quash and to Proceed Anonymously be denied. However, Plaintiff is willing to enter into a reasonable protective order to maintain as private Doe's identity and contact details.

Dated this 22nd day of September, 2017

Respectfully submitted,

Venice PI, LLC

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 22nd day of September, 2017, she electronically filed the foregoing "PLAINTIFF'S RESPONSE TO DEFENDANT

DOE'S MOTION TO QUASH SUBPOENA AND TO PROCEED ANONYMOUSLY" with the Clerk of the Court using the CM/ECF system which will electronically send notification of such filing to all counsel of record or interested parties via the CM/ECF system.

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